

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

-v-

WAYFARER STUDIOS LLC, JUSTIN  
BALDONI, JAMEY HEATH, STEVE  
SAROWITZ, IT ENDS WITH US MOVIE LLC,  
MELISSA NATHAN, THE AGENCY GROUP PR  
LLC, JENNIFER ABEL, JED WALLACE, and  
STREET RELATIONS INC.,

Defendants.

WAYFARER STUDIOS LLC, JUSTIN  
BALDONI, JAMEY HEATH, IT ENDS WITH US  
MOVIE LLC, MELISSA NATHAN, JENNIFER  
ABEL, and STEVE SAROWITZ,

Consolidated Plaintiffs,

-v-

BLAKE LIVELY, RYAN REYNOLDS, LESLIE  
SLOANE, VISION PR, INC., and THE NEW  
YORK TIMES COMPANY.

Consolidated Defendants.

Case No. 1:24-cv-10049-LJL  
(consolidated with 1:25-cv-00449-LJL)

**DECLARATION OF KRISTIN E. BENDER**  
**IN SUPPORT OF RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE**

I, Kristin E. Bender, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney admitted to practice before this Court, a partner in the law firm of Willkie Farr & Gallagher LLP, 1875 K Street NW, Washington, DC 20006, and counsel of record for Blake Lively in the above-captioned action.

2. I respectfully submit this declaration in support of Ms. Lively's response to the Court's Order to Show Cause issued on July 9, 2025. *See* ECF No. 403.

3. On June 10, 2025, counsel for Ms. Lively asked counsel for the Wayfarer Parties during a party conferral whether they represented Mr. Mitchell, subsequently inquiring by email on June 11, 2025, as to whether "Liner does or intends to represent Matthew Mitchell in connection with third-party discovery."

4. On June 12, counsel for the Wayfarer Parties (at Liner Freedman) responded, "our firm does not represent Matthew Mitchell."

5. On June 13, counsel for Ms. Lively filed a motion for alternative service as to Mr. Mitchell, on June 18, the Court granted the motion, and on June 23, counsel for Ms. Lively filed the requisite proof of service. *See* ECF Nos. 330, 356, 373.

6. On July 2, counsel for the Wayfarer Parties provided responses and objections for Mr. Mitchell, indicating that they (including Liner Freedman) represent Mr. Mitchell.

7. On July 10, counsel for Ms. Lively emailed counsel for the Wayfarer Parties urging, "please advise if you represent, will represent, or know who does or will represent any of the following: Cynthia Barnes-Slater, Dervla Mcneice, or Perez Hilton, so that we can save the Court unnecessary motions for alternative service." *See* Exhibit A.

8. The same evening, counsel for the Wayfarer Parties at Liner Freedman responded, with Mr. Freedman copied, “We do not represent these individuals and therefore have no authority to accept service on their behaves.” *Id.*

9. Ms. Lively has provided notice of more than 60 third-party document subpoenas to date. Further, Ms. Lively intends to file motions for alternative service for several third parties in the near future.

10. A true and correct copy of an email chain ending on July 10, 2025 between counsel for Ms. Lively and the Wayfarer Parties, is attached hereto as **Exhibit A** (excerpted).

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: July 11, 2025

s/ Kristin E. Bender

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